

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION

VALERO ENERGY CORPORATION)	
and its subsidiaries,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO. 7:17-cv-00004-O
)	
UNITED STATES ENVIRONMENTAL)	
PROTECTION AGENCY, <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

**SUPPLEMENT TO PLAINTIFFS' RESPONSE IN OPPOSITION TO
DEFENDANTS' MOTION TO DISMISS**

Plaintiffs Valero Energy Corporation and its subsidiaries ("Valero") respectfully submit this evidentiary supplement to Plaintiffs' Response in Opposition to Defendants' Motion to Dismiss, Dkt. 23 ("Plaintiffs' Response"). Attached hereto as Exhibit 1 is the Declaration of Richard Walsh offered in support of the factual assertions on page 8, footnote 4 of Plaintiffs' Response. Dkt. 23 at 8 n.4.

Dated: June 19, 2017

Respectfully submitted,

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CERTIFICATE OF SERVICE

On June 19, 2017, I electronically submitted the foregoing document with the Clerk of the Court for the U.S. District Court for the Northern District of Texas, using the electronic case filing system of the Court. I hereby certify that I have served all counsel of record electronically.

/s/ Christopher L. Dodson
Christopher L. Dodson

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION

VALERO ENERGY CORPORATION
and its subsidiaries,

Plaintiff,

v.

UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY, *et al.*,

Defendants.

CIVIL ACTION NO. 7:17-cv-00004-O

DECLARATION OF RICHARD WALSH

I, Richard J. Walsh, declare as follows.

1. My name is Rich Walsh. I am over eighteen (18) years of age, of sound mind, have never been convicted of a felony or misdemeanor involving moral turpitude, and am fully competent to make this declaration.
2. I am employed as Senior Vice President and Deputy General Counsel for Valero Energy Corporation ("Valero"). My job responsibilities generally include directing and overseeing Valero's Commercial Litigation and Regulatory Law Divisions of the legal department. My duties including interfacing with key regulatory agencies such as the U.S. Environmental Protection Agency ("EPA").
3. On July 7, 2015, I participated in a meeting on Valero's behalf with EPA Region 6 Administrator Ron Curry and other Region 6 personnel at their offices at 1445 Ross Avenue, Dallas, Texas 75202 regarding the Point of Obligation.

In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 15, 2017.



Richard J. Walsh